

## NOODLZ LIMITED PRIVACY POLICY

### Your Consumer Privacy Policy Rights

Noodlz Ltd trading as Noodlz.com considers your privacy to be extremely important and maintaining your trust is paramount to us. We are fully committed to protecting your personal information and we want you to be confident that the information you give us when using our site is safe and secure. It is with this in mind that this privacy policy has been created. It explains how we will use your personal information when you visit our Site. It also outlines our approach to compliance with the General Data Protection Regulation (GDPR) and all other relevant data-protection legislation.

Equally importantly, it sets forth your privacy rights to give you a better, more personalised experience. Please take a moment to familiarise yourself with our privacy practices. Please also know that we value your opinion. Should you have any questions or comments related to this privacy policy, please contact us at [dataprotection@noodlz.com](mailto:dataprotection@noodlz.com)

### About us

We are Noodlz Limited (Company Registration Number 683781) (which will be referred to as “TNP” “we” or “us” or “our” in this document).

We are located at Unit C Priorsgate, Main Road, Tallaght, Dublin 24, D24X020, Ireland. Our VAT number is 3731616WH.

Noodlz Ltd trading as Noodlz.com operate a Data Sharing Portal (DSP) and a website or Public Facing Portal (PFP), jointly known as The Noodlz Portal (TNP). We are the Data Controller of your personal data.

We operate the Noodlz.com website as well as our mobile application

### Links to Third Party Websites Disclaimer

The Noodlz Portal may contain links to third party websites, plug-ins or applications. By clicking on those third-party links and thereby facilitating those connections you may allow third parties to collect or share data or information about you. The Noodlz Portal has absolutely no control over these third parties, and we are not responsible for their privacy statements, or how they collect, store or share your data.

You should be aware that when you leave The Noodlz Portal, we strongly advise that you carefully read the privacy policy of every website that you visit.

### **Data Protection Officer**

The Noodlz Portal has appointed an internal Data Protection Officer (DPO) for you to contact if you have any questions regarding this privacy statement, our privacy practices or if you wish to exercise your legal data rights. They can be contacted by email at [dataprotection@noodlz.com](mailto:dataprotection@noodlz.com)

### **What we offer**

- We provide a centralised database for licenced estate agents, both commercial and residential, and property valuers to store and share their data, and this part of our service shall be referred to as The Noodlz Data Sharing Portal (DSP).
- We also provide a public facing property portal on which the general public can view the properties advertised by licenced estate agents.
- Within our public facing property portal there are links to external services which may be of benefit or interest to persons selling, buying or renting properties.

We provide these links so as to make it easy for our customers to access services such as:

- Licenced Estate Agent services
- Tenant and landlord related services
- Financial services such as mortgages, loans etc.
- Insurance products
- Home moving services.
- Various utility services such as gas, electricity, broadband etc.
- Property valuation and surveying services
- Property maintenance services.
- Architects, engineers, surveyors' services

The centralised database and the public facing property portal will collectively be known as The Noodlz Portal.

## **What this privacy policy covers**

This is the Privacy Policy for The Noodlz Portal, our related apps, the tools on our website, our social media content and our Forum (the "Site").

The Noodlz Portal (referred to in this policy as "TNP," "we", "us" or "our") is the "controller" under data protection laws. Where we are processing your personal information in relation to our content and/or Site, we are the controller of your personal information.

Where we refer to "personal information" in this Privacy Policy, we mean information which constitutes "personal data" under the law. This can be any information that directly identifies you (such as your name or email address), but also information that identifies you indirectly or would identify you when pieced together with other information (such as your age, gender, demographic information, IP address, and cookie identifiers/other unique online identifiers).

The main purposes we collect and process your personal information are to: show you relevant content and to improve your experience on the Site; provide you with the Site and the other services you request from us, (together the "Services"); communicate with you directly when you've agreed to it, or when the law allows us to do this.

To operate The Noodlz Portal tools on our Site we may sometimes need to share your personal information with others. They will be responsible for how they process your personal information.

Our Site contains external links to other websites that are not subject to this Privacy Policy. We are not liable for anything that happens should you use them.

## **Personal information we collect**

The information we collect will depend on how you are using our Site and Services and should usually be clear to you at the time we collect it. We may also use cookies and other tracking technology to collect information about your online browsing behaviour and any devices you've used to access our Site.

## How we collect and use your personal information

We collect and use your personal information to allow you to interact with the Site.

This includes, without limitation, the following:

- If you register, or subscribe to one of our Services
- To create an account with us
- To save property searches, set up property alerts or to upload a property to any of our Services you will need to create an account with us. This typically involves you providing us with your name, email address, phone number, password and payment information where relevant. Where payment information is needed, we require your address to comply with EU VAT legislation. We may use this personal information to authenticate you and to provide you with the service you have requested from us and as per the terms and conditions you accept when creating an account.
- If you set up an account with us, we will send you welcome emails, designed to inform you of the benefits of your account, and to help you get the most out of your account.
- We will also use your information to deliver the benefits of your account to you including; saving searches, sending you property alerts, saving notes and ratings, placing and editing an advert, advert expiry reminders, advert refresh reminders and to deliver email newsletters.
- When you place an advert with us, all personal information which you include in the text of the advert will be published on our site.
- To pay for the Services you have requested from us - We may collect your payment information to pay for any Services you have requested from us, such as advertising a property on our site. This includes but is not limited to your credit and debit card number, card expiry date, CSV /CV2 number, BIC (Bank Identifier Code), IBAN (International Bank Account Number), direct debit mandate authorisation and cheques. Credit and debit card information is processed directly by PCI-compliant payment providers who perform payment services on our behalf. Occasionally, our employees receive payment information from customers over the phone. When this occurs, the payment information is entered as instructed into the relevant payment system and all other copies are deleted or destroyed immediately.

- To receive marketing communications - With your consent, we may periodically send promotional emails about features, events, exclusive offers and competitions to the email address you have provided. To receive marketing emails from us, you will need to provide us with at least your email address and in some cases, your first name and last name. We have an interest in making sure our marketing is relevant to you, so we may process your information to send you marketing communications tailored to your interests. You may at any time choose not to receive marketing communications from us by following the unsubscribe instructions included at the end of each email communication.
- The Noodlz Portal App - Once you have downloaded the Noodlz Portal App you will have the option to create an account which allows you to access enhanced tools and features to personalise and tailor your content.
- Internal reporting, insight and analysis - We may use your personal information to generate aggregated, anonymised data for the purposes of internal reporting, insight and analytics, enabling us to improve and personalise our Site, the products we offer and search results for our Site. In processing your information for these purposes, we may use Google Analytics. Where necessary this exercise may be carried out on our behalf by someone else.
- Site personalisation - We may use your personal information to personalise aspects of our Site, enable your details to be moved across our tools to speed up form filling and for market research. As part of this, we may match your personal information against information that has been collected by someone else. We are always working to make a better Site for you and using your personal information in this way helps us to do this. It also means that if you've given us permission, any communication we send to you is appropriate for your needs.
- Contacting you - We may use your personal information to:
- Respond to any communications that you've directed at us;
- Invite you to take part in polls and other market research activities carried out by us and on our behalf. Any feedback you provide will only be used to improve our Site and will not be published. It is up to you whether you want to take part in these activities; or

## **Why do we process your personal information**

We'll only collect and use your personal information in accordance with data protection laws. Our legal grounds for processing your personal information in the ways described in this Privacy Policy are as follows:

- Performance of a contract – To provide you with the services you sign up to.
- Consent – We will only collect and process your personal information where necessary and, if we're relying on consent for such processing, if you've consented for us to do so, for example, when you download The Noodlz Portal App and create an account.
- Legitimate Interests – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of "legitimate interests" as a justification for processing your personal information. Our legitimate interests for processing your personal information are:
  - To enable us to provide our services, including the TNP Tools;
  - To enable you to use our Forum and ensure it operates smoothly, we may use your personal information to make sure our Forum operates without disruption or abuse and to enforce our Terms; and
  - To improve our Site. We may use your personal information to undertake demographic segmentation and generate profiling information to help us understand what you might be interested in and for market research. We are always working to make a better Site for you and using your personal information in this way helps us to do this
- You have a right to object to our use of your personal information for these legitimate interests.
- Legal obligation – We may be required to process your personal information to comply with a legal obligation on us; for example, an obligation to disclose the information to a court or regulator, governmental, compliance or law enforcement agency, or in connection with legal proceedings; or to prevent fraud and money laundering, which might involve disclosure to a fraud prevention agency. We may also be required to process certain personal information about you to respond to (and verify we are able to respond to) a data subject rights request that you have submitted.

## **Use of children's information**

We do not knowingly collect or store any personal information about children under the age of 18. Anyone under the age of 18 years is not permitted to use this site.

## **Sharing your personal information with the rest of TNP group**

We are part of The Noodlz Group. TNP operates a shared IT infrastructure which includes shared technologies, platforms, systems and tools. Your data may be shared with other TNP entities as a result of this shared infrastructure. We implement shared security measures on this system which comply with data protection law and ensure that there are adequate internal controls to keep the data secure. This information might be used and analysed to improve products and services across The Noodlz Portal. However, the different entities will not use your personal information to send you direct marketing or target you with advertising, unless you have separately given your specific consent to this.

## **Sharing your personal information with others**

We may share your personal information with but is not limited to the following:

- Our technical partners –for the purposes of providing certain services and enabling your interaction with the Site, such as your use of TNP Tools.
- If necessary, in connection with legal proceedings or potential legal proceedings;

## **How you can amend your preferences**

All emails or other forms of communication directly from us to you will include clear instructions on how to unsubscribe. Plus, if you do not want to be contacted by us anymore, you can email [dataprotection@noodlz.com](mailto:dataprotection@noodlz.com)

## **Your information rights and responsibilities**

You've certain rights under data protection legislation in relation to the personal information we hold about you:

1. Right to access – The right to a copy of the personal information we hold about you. We will ask you to describe the information you require, as well as letting us know about any other email addresses you have used on our Site,

to enable us to trace your personal information. Depending on the nature of your request, we may also ask you for your full name, your date of birth and your full address and documents to allow us to verify your identity. Requests for copies of your personal information will be dealt with within one month, unless your request is complicated or if you've made a large number of requests. In these circumstances it may take us longer to deal with your request, in which case we'll let you know.

2. Right to correct – The right to have your personal information rectified if it is inaccurate or incomplete. Requests for us to correct your personal information will be dealt with within one month, unless your request is complicated or if you've made a large number of requests. In these circumstances it may take us longer to deal with your request, in which case we will let you know. If we believe that your personal information is accurate, we will let you know that we won't be amending your personal information and why.
3. Right to erasure of your information – The right to request that we delete or remove your personal information from our systems. Data protection laws give exceptions to this right which, if applicable, we'll explain in our response to you.
4. Right to restrict our use of your information – In some circumstances you can 'block' us from using your personal information or limit the way in which we can use it.
5. Right to data portability – The right to request that we move, copy or transfer your personal information, and
6. Right to object – The right to object to our use of your personal information including where we use it for our legitimate interests, or where we use your personal information to carry out profiling to inform our market research and user demographics. If you raise an objection, we'll stop processing your personal information unless an exemption under data protection law applies, in which case we'll let you know why we're continuing to process your personal information. Some of the TNP Tools give you the option to hear from us by email about tips, news, and relevant The Noodlz Portal products and exclusives. You have the right to object to our processing of your personal information in this way.

## **Cookies**

We use cookies (files which are sent by us to your computer or other devices), web beacons, pixel tags and tracking technology to help improve the functionality and performance of our Site. The information coming from our use of cookies will be aggregated to provide statistical information about the usage of our Site. However, we do not use any information derived from cookies, nor any IP addresses we collect, to identify any individual user of our Site. Some third-party technology we use (such as embedded videos, social sharing) also drop cookies to improve your experience on their sites.

## **Where we store your personal information**

Your Personal Data is held on secure servers hosted by our Internet Service Provider. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data. Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection laws. It might sometimes be necessary for us or our suppliers to transfer your personal information either within the European Economic Area (EEA); or outside of the EEA. However, we will only transfer your personal information to a jurisdiction which has not been determined by the Government as being "adequate" for data protection purposes if we have put in place appropriate safeguards and protections as stated under Irish, European and / or UK law, for example by the use of a data-transfer agreement incorporating either the international data transfer agreement or addendum, which have been approved by the relevant Government/s in accordance with Data Protection law.

## **How long do we keep your personal information etc**

We will only hold your personal information on our systems for the period necessary to fulfill the purposes outlined in this Privacy Policy and/or in cases in which you've provided your consent (which you may withdraw at any time), or until you request it is deleted (unless a longer retention period is required or permitted by law).

Generally, you can expect us to keep your personal information while you use the Site or TNP Tools (or have used TNP Tools recently, where you have applied for or purchased products or services via the Portal, we will need to keep your personal information for longer for accounting purposes – up to seven (7) years following the date on which it is provided to us. If, having registered for any of our services, you do not use them for a reasonable time (which may vary depending on the service(s) you've registered for) we may contact you to ensure you're still happy to receive communications from us. Even if you delete, or ask us to delete your personal information, it may persist on back-up or archival media for legal, tax or regulatory purposes.

### **How to contact us**

Our Data Protection Officer is Liam Hogan. Should you have any queries relating to our use of your personal information or any other related data protection questions, please contact us at [dataprotection@noodlz.com](mailto:dataprotection@noodlz.com) or write to us c/o The Data Protection Officer at Unit C Priorsgate, Main Road, Tallaght, Dublin 24, D24 X020

### **Changes to this privacy policy**

This version of the Privacy Policy was last updated on 31<sup>st</sup> March 2025. We reserve the right to amend or modify this Privacy Policy at any time and any changes will be published on the Site. The date of the most recent revision will appear on this page. If we make significant changes to this policy, we may also notify you by other means such as sending you an email. If you do not agree with any changes, please do not continue to use the Site or App.